

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

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UNITED STATES OF AMERICA

:

v.

:

: Criminal No. 2:14-CR-19

:

RICHARD CYR,
Defendant

:

:

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT I

From about October 12, 2013 through October 16, 2013, in the District of Vermont, the defendant, RICHARD CYR, then a 27-year-old man, used a means and facility of interstate commerce, namely, the Internet and a computer, to knowingly persuade, induce, and entice an individual who had not attained the age of 18 years, that is, K.S., to engage in sexual activity for which a person can be charged with a criminal offense under the law of the State of Vermont, namely 13 V.S.A. § 3252.

(18 U.S.C. § 2422(b))

COUNT II

From about October 12, 2013 through October 16, 2013, in the District of Vermont, the defendant, RICHARD CYR, then a 27-year-old man, used a means and facility of interstate commerce, namely, the Internet and a computer, to knowingly attempt to persuade, induce, and entice an individual who had not attained the age of 18 years, that is, K.S., to engage in sexual activity for which a person can be charged with a criminal offense under the law of the State of Vermont, namely 13 V.S.A. § 3252.

(18 U.S.C. § 2422(b))

COUNT III

In about September 2013, in the District of Vermont, the defendant, RICHARD CYR, then a 27-year-old man, used a means and facility of interstate commerce, namely, the Internet and a computer, to knowingly attempt to persuade, induce, and entice an individual who had not attained the age of 18 years, that is, K.P., to engage in sexual activity for which a person can be charged with a criminal offense under the law of the State of Vermont, namely 13 V.S.A. § 3252.

(18 U.S.C. § 2422(b))

COUNT IV

On or about October 13, 2013, in the District of Vermont, the defendant, RICHARD CYR, knowingly distributed a visual depiction using a means and facility of interstate commerce, and which had been shipped and transported in and affecting interstate commerce, the production of such visual depiction having involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of such conduct.

(18 U.S.C. § 2252(a)(2))

COUNT V

In or about September and October of 2013, in the District of Vermont, the defendant, RICHARD CYR, knowingly received a visual depiction, using a means and facility of interstate commerce, and that had been shipped and transported in and affecting interstate commerce, by any means including by computer, the production of such visual depiction having involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct.

(18 U.S.C. § 2252(a)(2))


COUNT VI

On or about October 25, 2013, in the District of Vermont, the defendant, RICHARD CYR, knowingly possessed at least one matter, which contains a visual depiction that has been shipped and transported using any means and facility of interstate commerce and in and affecting interstate commerce, and which was produced using materials which have been so shipped and transported, by any means including by computer, the production of such visual depiction having involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct.

(18 U.S.C. § 2252(a)(4)(B))

A TRUE BILL

FOREPERSON

 (CEN)

TRISTRAM J. COFFIN
United States Attorney
Rutland, Vermont
December 17, 2014